

FILED
U.S. DISTRICT COURT
AUGUSTA, GA.

UNITED STATES DISTRICT COURT

2022 SEP -7 P 3:04

for the

Southern District of Georgia

CLERK 
SO. DIST. OF GA.

Augusta Division

Case No. CV 122-113

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☒ No

James Lamont Taylor

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

OneMain Financial Group, LLC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

James Lamont Taylor

2023 Ashley Drive

Augusta; Richmond

Georgia; 30906

(706) 631-6774

jltaylor1914@yahoo.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

OneMain Financial Group, LLC
Finance Company
221 SE Everett Mall, Ste M4
Everett, WA
Washington; 98208-3254
(800) 290-7002
N/A

Defendant No. 2

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

N/A

Defendant No. 3

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

N/A

Defendant No. 4

Name
Job or Title *(if known)*
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address *(if known)*

N/A

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. 15 USC 1602, 15 USC 1691

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) N/A, is a citizen of the State of (name) N/A.

b. If the plaintiff is a corporation

The plaintiff, (name) N/A, is incorporated under the laws of the State of (name) N/A, and has its principal place of business in the State of (name) N/A.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, (name) N/A, is a citizen of the State of (name) N/A. Or is a citizen of (foreign nation) N/A.

b. If the defendant is a corporation

The defendant, (name) N/A, is incorporated under
the laws of the State of (name) _____, and has its
principal place of business in the State of (name) _____.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

N/A

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

OneMain Financial Group, LLC

After providing my credit card online to OneMain, a consumer credit transaction was completed on 02/05/2021. 1. OneMain denied credit on 02/05/2021 (Exhibit, pages 1-2). 2. Pursuant to 15 USC 1691(a)(3), the denial by OneMain on 02/05/2021, discriminates against my rights as a creditor.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

I request relief of \$54 million from OneMain, due to their denial and discrimination, which has caused me emotional distress, mental anguish and pain and suffering. OneMain benefitted from the transaction and I received no benefit at all. I also attempted to resolve issue outside of court with no resolution (Exhibit, pages 1-2). The credit was intended for food, transportation, medicine, medical supplies, and medical hair appointments.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

09/02/2022

Signature of Plaintiff

Printed Name of Plaintiff

James Lamont Taylor
James Lamont Taylor

B. For Attorneys

Date of signing:

N/A

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

N/A

OneMain Financial

Executive Office of Customer Care
PO Box 1170
Evansville, IN 47706-1170
888-864-0332
OneMainFinancial.com

June 24, 2022

James Lamont Taylor
2023 Ashley Drive
Augusta, Georgia 30906

Re: Complaint filed with the Consumer Financial Protection Bureau (“CFPB”)

Dear James Lamont Taylor:

This letter responds to the CFPB complaint you filed regarding OneMain Financial Group, LLC (“OneMain”). OneMain appreciates hearing from you and welcomes the opportunity to respond to the issue you raise.

In your complaint, you state that OneMain improperly declined your credit application on February 5, 2021, in violation of 15 USC 1611 and 15 USC 1691. Therefore, you request OneMain extends you credit and compensate you \$444,000.

OneMain strictly denies that it violated any applicable laws in the handling of your application for credit and requests evidence to the contrary. OneMain takes accusations of discrimination very seriously. As a community lender, OneMain’s commitment to fair lending and treating customers fairly is important. OneMain is fully committed to compliance with the letter and spirit of fair lending and nondiscrimination laws in the treatment of its customers and potential customers. Discrimination is prohibited and completely inconsistent with OneMain’s core beliefs and practices. Company policies strictly prohibit any form of unlawful discrimination. Employees undertake required training to assist them with meeting their obligations. OneMain thoroughly investigates complaints of discrimination and takes appropriate corrective action. OneMain found no evidence of dissimulatory actions associated with the handling of your application.

OneMain’s records indicate that on February 5, 2021, you received an offer to apply for a OneMain loan through the Credit Karma website, a financial services website that helps consumers find personal loans. Specifically, on the Credit Karma website, you provided information to determine if you had loan offers from participating lenders. Based on the information you provided, Credit Karma showed you available loan offers. You selected the

OneMain offer. After selecting the OneMain offer, you were redirected from the Credit Karma website to the OneMain website to complete the OneMain loan application. You submitted your application, but OneMain declined your request for the reason of "percentage of satisfactory accounts."

An application by a consumer for credit gives rise to a permissible purpose under the Fair Credit Reporting Act ("FCRA") for a creditor to obtain the consumer's credit report. When a consumer applies for credit, whether in person, by phone, by mail, or by electronic means, the FCRA authorizes the creditor to obtain the consumer's credit report without requiring the creditor to obtain specific authorization from the consumer.

OneMain encourages you to reapply if your circumstances have changed but respectfully declines your request for compensation.

I am your designated point of contact at OneMain. If you have any additional questions concerning this matter, please feel free to call me between 8 a.m. and 5 p.m. (Central time) at 888-864-0332.

Sincerely,

/s/ Audrey Conner

Audrey Conner
Executive Office of Customer Care